

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

-----X
In re:

Chapter 11

WHITEHORSE 401 LLC,

Case No. 24-42466 (ESS)

Debtor.
-----X

DECLARATION OF REEMA LATEEF

Pursuant to 28 U.S.C. § 1746, Reema Lateef declares as follows:

1. I am a Trial Attorney in the Office of the United States Trustee for Region 2. I have knowledge and information about the Chapter 11 bankruptcy case of **Whitehorse 401 LLC** (the “Debtor”). I submit this Declaration in support of the Motion of the United States Trustee to Dismiss This Chapter 11 Case pursuant to 11 U.S.C. § 1112 (the “Motion”).

2. Michel Steiman signed the Petition and appeared on behalf of the Debtor at the adjourned 341(a) meeting of creditors (“July 25th Meeting of Creditors”) on July 25, 2024¹. ECF Doc. Nos. 1, 22, Petition. Mr. Steiman stated that he was appointed by corporate resolution as a manager to appear on behalf of the Debtor to advise and assist on the bankruptcy case.

3. At the August 5, 2024, 341(a) meeting of creditors (“August 5th Meeting of Creditors”), the United States Trustee stated that the Corporate Resolution, *ECF Doc. No. 25*, is not effective and that an amended resolution must be filed by the Owner or any other individual with appropriate power to give Mitchel Steiman, or any other individual, authorization to act on behalf of the Debtor.²

¹ A transcript of the Meeting of Creditors can be furnished upon request.

² A transcript of the 341 meeting of creditors can be furnished upon request.

4. On August 30, 2024, the adjourned 341(a) meeting of creditors took place (“August 30th Meeting of Creditors”)³. At the August 30th Meeting of Creditors an individual, “Isaac Taub,” appeared on behalf of the Debtor with the intention to replace Mitchel Steiman. Mr. Taub appeared as controller for the proposed CRO for the Debtor.

5. The Operating Agreement of Whitehorse 401 LLC provided to the United States Trustee indicates that Yechiel Rivlin is the Sole Member and Principal of the Debtor. Exhibit A.

I declare under penalty of perjury that the information contained in this Declaration is true and correct to the best of my knowledge.

Dated: New York, New York
September 26, 2024

/s/ Reema Lateef
Reema Lateef, Esq.

³ A transcript of the 341 meeting of creditors can be furnished upon request.